

EXHIBIT 11

Declaration of Susan Greenhalgh – 02/20/24

***PLAINTIFFS' MOTION FOR SANCTIONS AGAINST DEFENDANTS
CCBOER AND COUNSEL***

CGG, et al. v. Coffee Cty. Bd. of Elections and Registration
United States District Court for the Southern District of Georgia
No: 5:23-mc-00001-LGW-BWC

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION**

**COALITION FOR GOOD
GOVERNANCE and DONNA
CURLING,**

Plaintiffs,

v.

**COFFEE COUNTY BOARD OF
ELECTIONS AND REGISTRATION,**

Defendant.

**Civil Action No. 5:23-mc-00001-
LGW-BWC**

**In RE Subpoenas issued by the
United States District Court
For the Northern District of
Georgia, Atlanta Division,
Civil Action File No. 1:17-CV-
2989-AT**

DECLARATION OF SUSAN GREENHALGH

SUSAN GREENHALGH declares the following to be true and correct under penalty of perjury, pursuant to 28 U.S.C. § 1746:

Description of Work in Connection with the Coffee County Discovery Dispute

1. I am of legal age and competent to provide this affidavit. All the information herein is based on my own personal knowledge unless otherwise indicated.
2. I have studied and worked in the area of election security and election technology for over 18 years.
3. I have researched policies, procedures and laws regarding the use of electronic voting machines from 2005 to the present. I have been

invited to speak on electronic voting to the U.S. Commission on Civil Rights, the International Association of Government Officials, the Mid-West Election Officials' conferences and many other election technology and administration conferences. I have been invited to brief congressional staffers in both the U. S. House and Senate on electronic voting and routinely do so, including on the topic of the national election risk impact of the Coffee County breaches

4. My full curriculum vitae is attached at **Exhibit A**.
5. I was engaged as a consulting expert to the counsel for Coalition for Good Governance (CGG) plaintiffs in the Curling v. Raffensperger litigation September 8, 2020.
6. Over several months in 2022, I communicated extensively with the CGG legal team via phone, email and messaging services to discuss, consult and assist in the Coffee County Discovery activities.
7. I reviewed documents and records produced in discovery, researched publicly available records related to the events in Coffee County at the center of the breach activities, and consulted and advised CGG and its legal on proposed actions including discovery plans and details of proposed inquiries.

8. Upon instruction and with the oversight of the CGG team, I reviewed draft discovery requests and relevant filings and provided comments on those drafts.
9. Upon instruction and with the oversight of the CGG team, I researched records in advance of depositions taken in the course of the Coffee County breach-related depositions, reviewed and provided comments on proposed deposition questions, and remotely attended the depositions in order to provide legal counsel with advice during the depositions.
10. I remotely attended court hearings and teleconferences addressing the Coffee County breach activities, and reviewed related transcripts.
11. I reviewed AEO documents related to Coffee County investigations produced by State Defendants at the request of CGG counsel and provided my advice and judgement.
12. Upon instruction and oversight of CGG, I reviewed transcripts of hearings and depositions relevant to the Coffee County voting system breach and provided feedback to assist in next steps of discovery other litigation activity

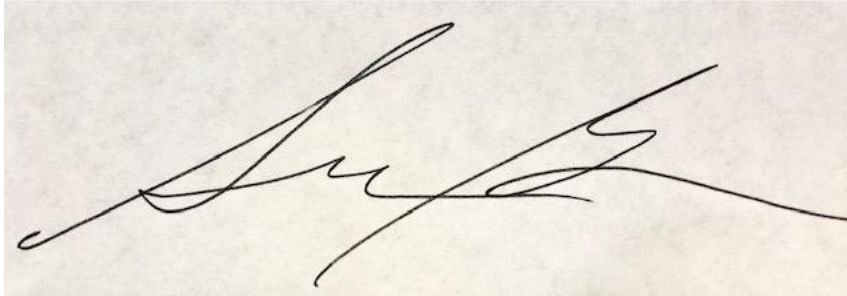
Identification of Time and Expenses

13. Attached at **Exhibit B** is my work log related to the time spent for the Coffee County breach litigation support activity. It does not include my time spent on the larger Curling v. Raffensperger litigation.
14. The total amount of my time billed on the Coffee County Discovery is 111.0 hours, which at my rate of \$300/hour equals a total of \$ 33,300. I did not include numerous hours I spent in background research, fact-finding conversations with CGG's Executive Director or its research volunteers.
15. Over the next several days, I will be working with the CGG legal team to further analyze and refine the time billed in order to allocate time to various categories related to the Motion for Sanctions.

Thereafter, I anticipate filing a supplemental declaration reflecting that additional information.
16. Based on my professional experience, the amounts of time I expended is reasonable and necessary under the circumstances and based on the complex facts of the Coffee County breaches.
17. Based on my experience and familiarity with consulting on issues of election integrity and security, the hourly rate I charged in connection with the Coffee County breach activities.

is fair and reasonable under the circumstances.

I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 20th day of February, 2024.

A handwritten signature in black ink on a light-colored, textured background. The signature is stylized and cursive, starting with a large, sweeping 'A' and ending with a long, horizontal stroke that extends to the right.

[Amityville, New York]

Exhibit A

Susan Greenhalgh

ELECTION SECURITY EXPERT

SEGREENHALGH@GMAIL.COM

917 796 8782

Employment 2020-Present – Senior Advisor for Election Security
Free Speech For People

2018-2020 – Vice President of Policy and Programs
National Election Defense Coalition

2017-2018 – Vice President of Policy
2007-2017 – Consultant
Verified Voting

**Competencies and
Experience**

- Review and study state and federal election laws and regulations with respect to election system security.
- Participate in national and local election administration meetings and conferences.
- Create and give presentations on voting technology topics.
- Review and assess state and federal voting system testing and certification standards.
- Advocate for secure, auditable and accessible voting systems.
- Draft materials, position papers, and testimony on voting system security policy and administration procedures.
- Recruit and coordinate with allied organization to promote secure, auditable and accessible voting systems.
- Review and analyze state voting systems standards and federal Voluntary Voting System Guidelines.
- Submit public comments on voting system standards.
- Study reports on voting system technology.
- Participate in symposiums and conferences on voting systems.
- Monitor state and federal committees and activities relevant to election security policy and legislation.
- Maintain relationships with Congressional Members and staffers on committees with oversight of election administration policy issues.
- Maintain and build relationships with state and local election officials.

Publications

PEER REVIEWED CONFERENCE PAPER

October 2022

"Internet Voting is Being Pushed with False Claims and Deceptive Marketing"

Author: Greenhalgh, Susan
E-Vote ID 2022, October 4-7, 2022, Bregenz, Austria
University of Tartu; Karlsruher Institut für Technologie
<https://dspace.ut.ee/items/976ddd1e-24d9-4032-8e7c-016556e0d70b>

PAPERS

June 2020

"Leveraging Electronic Balloting Options Safely and Securely During the COVID-19 Pandemic"

Authors: Greenhalgh, Susan
Newell, Steven, PhD
American Association for the Advancement of
Sciences
Published by: Free Speech For People and the American Association for the Advancement
of Sciences
<https://www.aaas.org/sites/default/files/2020-06/Leveraging%20Electronic%20Balloting%20Options%20Safely%20and%20Securely%20During%20the%20COVID-19%20Pandemic.pdf>

April 2020

"Safe Voting During the COVID-19 Pandemic"

Authors: Mukherjee, Joia, MD
Ritchie, Mark
Fein, Ron
Greenhalgh, Susan
Hostetler, Courtney
Published by: Free Speech For People
<https://freespeechforpeople.org/wp-content/uploads/2020/04/fsfp-report-on-safe-voting-04-07-2020-11.pdf>

September 2018

"Email and Internet Voting: the Overlooked Threat to Election Security"

Authors: Greenhalgh, Susan
Goodman, Susannah
Rosenzweig, Paul
Epstein, Jeremy
Published by: Association for Computing Machinery and Common Cause
<https://www.acm.org/binaries/content/assets/public-policy/jtreportemailinternetvoting.pdf>

Articles

- November 2023 **“Internet voting remains a risky method of casting election ballots”**

By: Susannah Goodman, Susan Greenhalgh, Lawrence Norden
Published by: The Hill
<https://tinyurl.com/ysk4v895>
- October 2023 **“The Georgia Voting Machine Theft Poses a Direct Threat to The 2024 Elections”**

By: Cliff Albright, Professor Rich DeMillo, Susan Greenhalgh
Published by: Slate
<https://tinyurl.com/bdzf87cr>
- August 2023 **“One Trump Georgia Scheme Goes Much Deeper. Where Are the Feds?”**

By: Ben Clements and Susan Greenhalgh
Published by: Slate
<https://tinyurl.com/42jhkknv>
- May 2023 **“Trump Was Implicated in a Vote Machine Theft. Why Isn’t DOJ Investigating?”**

By: Ben Clements and Susan Greenhalgh
Published by: Slate
<https://tinyurl.com/5n65z9t7>
- March 2022 **“Setting the record straight on the security review in the Georgia voting machine lawsuit”**

By: Susan Greenhalgh and Professor Philip Stark
Published by: Election Law Blog
<https://electionlawblog.org/?p=127945>
- September 2021 **“Election Security Problems Still Must be Addressed”**

By: Susan Greenhalgh and Professor Alex Halderman
Published by: Newsweek
<https://tinyurl.com/5n73bewd>
- March 2021 **“Voting Machine Hashcode Testing: Unsurprisingly insecure, and surprisingly insecure”**

By: Professor Andrew Appel and Susan Greenhalgh
Published by: Freedom to Tinker
<https://tinyurl.com/7runpere>
- December 2019 **“NC elections board needs to block less secure voting machines”**

By: Rev. Dr. Anthony Spearman and Susan Greenhalgh
Published by: The Fayetteville Observer
<https://tinyurl.com/hnvpbba3>

Invited talks and presentations

August 2023	DEF CON Voting Village "Despite the security concerns, some states unwisely permit voting over the internet" Las Vegas, Nevada
June 2023	State Testing and Certification Conference "Limitations of ES&S hashcode testing" Huntsville, Alabama
October 2022	E-VOTE ID "Internet voting is being pushed with false claims and deceptive marketing" Bregenz, Austria
August 2021	DEF CON Voting Village "Wireless Odyssey" Virtual
June 2020	State Testing and Certification Conference "Leveraging Electronic Balloting Options Safely and Securely During the COVID-19 Pandemic" With Dr. Steve Newell Virtual
March 2020	John Breaux Symposium Reilly Center for Media and Public Affairs Manship School of Mass Communication Louisiana State University "Security of Election Systems" Baton Rouge, Louisiana
July 2019	U.S. Commission on Civil Rights Public Hearing: Voter Suppression and Disenfranchisement in Florida Invited testimony: "Ensuring Integrity of the Vote" Fort Lauderdale, Florida
June 2017	MITRE Corporation Executive Summit Shaping the Future of Cyberspace Invited speaker, "Election Cybersecurity" McLean, Virginia
December 2016	National Conference of State Legislatures Legislative Summit "Contingency Planning for Elections" Washington, DC
March 2015	EVN Conference "Internet Voting Reports and Resources" Washington, DC
March 2014	EVN Conference "Internet voting and beyond" San Diego, California
March 2013	EVN Conference "Online ballot marking and Internet voting systems" Atlanta, Georgia

	March 2012	EVN Conference "Internet voting and technology programs" Santa Fe, New Mexico
Professional activities and affiliations	2019-present	Consulting Expert, Curling v. Raffensperger plaintiffs Qualified as an expert by the Federal District Court, Northern District of Georgia
	2017-present	Member Secure Our Vote Coalition
	2012-present	Member State Audit Working Group
	2016-2019	Member, VVSG Cybersecurity Working Group National Institute of Standards and Technology
	2014	Chair, conference planning committee EVN Conference San Diego, California
	2009-2014	Member, conference planning committee EVN Conferences
	2006-present	Member EVN
Education	2008	Bachelor of Arts University of Vermont Chemistry

Exhibit B

	Activity	Time spent	CC Discovery activities; billed
2/13/22	Meeting/consult with CGG on Coffee allegations/review records coffee, suggest discovery efforts via email and phone	3.25	2.25
2/14/22	Review info and records on Coffee	1.00	1.00
2/15/22	Consult call with CGG on potential breach	1.00	.5
2/21/22	Prep for Sterling deposition re: coffee allegations/phone call w/CGG team and records review	2.5	2.5
2/23/22	Research ORR and publicly available records and press accounts on Coffee County and software breach allegation	1.25	.75
2/24/22	Gabe Sterling deposition, attend remotely	7.0	
3/6/22	Research and review documents/assist on Coffee/share findings	1.75	1.25
3/10/22	Merritt Beaver deposition, attend remotely	7.0	
3/12/22	Consult via phone meeting with CGG re: Coffee public records inquiries, develop requests	1.0	.5
3/13/22	Review court records and transcripts from previous depositions with respect to software breaches/election office security	2.75	1.25
3/19/22	Review records from GA legislative hearings on Coffee County, draft executive order, Hampton video	2.5	2.00
3/26/22	Consult via email and phone with CGG re ORRs from Coffee re server issues/review ORR documents	2.5	1.75
3/29/22	Breach research/consult with cyber security expert	1.5	.75
3/30/22	Review Beaver deposition transcript, comments about security and software breaches	1.25	.75
4/7/22	Hearing on Coffee County allegations	1.75	
4/9/22	Consult with CGG on discovery/testimony developments/next steps	1.75	1.25
4/13/22	Consult with CGG team by phone over ORRs from Coffee/review ORR documents	3.5	2.5
4/16/22	Review Chris Harvey 2/11/23 deposition transcript with respect to county security	2.5	2.5
4/17/22	Review of Coffee County ORR docs/server issues/consult with CGG team and CGG experts	2.5	1.25
4/24/22	Research press accounts and publicly available documents re Ramsland/Logan/Lenberg	2.5	1.25
4/28/22	Watch Gabe Sterling presentation/remarks at the Carter center regarding Coffee County, share with counsel.	.75	.25
5/2/22	Research of AZ lawsuit/breaches in other states and actors that were alleged to be involved in Coffee County breach	2.0	1.0
5/5/22	Consult with CGG by phone regarding Coffee and other breaches	1.0	.5
5/13/22	Provide background facts to reporter/consult with CGG re Coffee ORR production	1.0	.5
5/14/22	Review testimony and records provided to the GA legislature from Cathy Latham, other witnesses re allegations in Coffee	2.75	2.75
5/21/22	Review declarations and documents from AZ case citing to Coffee County breach	2.0	1.0
5/28/22	Review and consult on Coffee discovery documents	2.0	2.0

6/1/22	Review GA legislature transcripts from actors involved in Coffee County breach	2.0	2.0
6/3/22	Consult with CGG regarding media inquiries	.75	
6/11/22	Transcript review of June 7 teleconference on Coffee County	2.5	2.00
6/12/22	Conduct research on discovery produced regarding Coffee County	3.75	2.00
6/13/22	Consult with CGG regarding press inquiries and conference with NYT and ORR responses	1.0	
6/20/22	Advise and consult with CGG on oped draft and public education	2.5	2.5
6/25/22	Consult with CGG team and experts on discovery issues	1.5	1.5
6/26/22	Continue work on discovery issues	1.0	.5
7/2/22	Consult with CGG, review and edit letter to the SEB on software breaches	1.5	
7/3/22	Help with discovery issues	1.75	1.0
7/19/22	Consult with press and CGG team on Coffee issues/WaPo/NYT/AP; and consult on Barnes depo outline review	1.75	1.0
7/20/22	Watch and consult/provide info James Barnes deposition	5.5	
7/21/22	Review CGG expert declarations on Coffee	2.0	2.0
7/24/22	Barnes depo transcript review	2.75	2.25
7/28/22	Review briefs on State's investigation into Coffee County	3.5	2.0
7/30/22	Press outreach on CGG filing	2.5	
08/3/22	Research/develop materials/consult with other CGG experts	4.75	2.5
08/5/22	Review Germany declaration on Coffee investigation/draft points on background briefing	2.5	
08/7/22	Prep for Cathy Latham deposition/consult with CGG team and experts	3.0	3.0
08/8/22	Watch and consult/provide info Cathy Latham deposition	6.0	
08/9/22	Consult with CGG team and experts on Coffee ORRs	2.0	1.5
08/10/22	Research relevant ORRs	1.0	1.0
8/12/22	Review Still lawsuit and other allegations related to Coffee breach	2.0	1.5
08/13/22	Consult with CGG and review documents produced in discovery from Sullivan Strickler proving the Coffee County breach	2.5	2.5
08/14/22	Review SS documents from discovery	2.25	2.25
08/15/22	Eric Chaney deposition	5.0	
08/16/22	Press outreach with CGG team /Riddlehover deposition	3.5	
8/17/22	Further review of discovery documents with CGG team and experts	1.25	1.25
8/20/22	Consult with CGG team regarding SullivanStrickler documents/research related to documents	3.5	2.5
8/21/22	Assist on press statement on SS discovery	1.0	
8/24/22	Review outline for Cotton deposition	1.0	.5
8/25/22	Watch and consult/provide info Ben Cotton deposition	6.0	
08/27/22	SullivanStrickler depo prep/exterior video review	2.0	1.0
08/28/22	Sullivan Strickler depo research	2.0	1.5
8/30/22	Provide background info to press	.75	

9/1/22	Wendell Stone deposition	4.5	
9/2/22	Watch and consult/provide info for Sullivan Strickler deposition	6.5	
9/4/22	Review Sullivan Strickler transcript and exhibits	2.25	1.25
9/5/22	Review and consult with CGG team on video production of Coffee office	4.5	3.5
9/6/22	Draft and consult on experts' letter to SEB on Coffee breach	3.0	
9/7/22	Re-review Cotton deposition	.75	.75
9/8/22	Experts' letter to SEB on Coffee	1.5	
9/11/22	Consult with CGG team and assist research into Scott Hall/Coffee breach	2.5	2.5
9/18/22	Review and research photos and video from Coffee County/consult with CGG and experts	2.25	2.25
9/20/22	Draft and edit media advisory	2.75	
9/21/22	Media briefing and follow up, draft FAQ	6.0	
9/24/22	Consult w/CGG team and experts over plan to replace Coffee election equipment	2.25	2.25
9/26/22	Advise and consult with CGG team on deficient searches by Coffee County/hearing	2.5	1.5
9/27/22	Research on deficient searches and SOS conflicting statements	3.25	1.25
10/1/22	Review transcript of 9/30/22 teleconference on Coffee	1.25	1.25
10/8/22	AEO doc review for Latham document production	1.75	1.75
10/9/22	AEO Docs review for SOS Coffee investigative files	2.0	2.0
10/11/22	Review of non AEO discovery documents/ Sterling depo preparation	3.0	1.5
10/12/22	Sterling deposition	7.0	
10/22/22	Review Sterling deposition transcript	1.5	1.5
10/29/22	Logan document/filing review	2.25	2.25
11/1/22	Consult on prep for Logan depo	1.25	1.25
11/7/22	Review discovery documents produced	2.0	1.0
11/10/22	Consult on preparation for Misty Hampton deposition	1.5	1.5
11/11/22	Misty Hampton deposition	6.0	
11/14/22	Review discovery production	1.75	1.75
11/20/22	Consult on Logan and Lenberg discovery preparation	2.75	2.75
11/21/22	Jeff Lenberg deposition	8.0	
11/22/22	Alex Cruce deposition	4.5	
11/23/22	Review Lenberg report on Halderman report	1.0	1.0
11/25/22	Review Latham discovery production	1.5	1.5
11/26/22	Review Logan signal message review re: Coffee-related messages	3.0	3.0
		247.0	111.0